

Atty. Dkt. No. 200208417-1

REMARKS

This Reply is in response to the Office Action dated March 6, 2006.
Applicants request reconsideration and allowance of the present application.

I. Claim Rejections – 35 USC § 102

On page 2, the Office Action rejected claims 1-9, 12-19, 21-24, 31-34, and 36-38 as being anticipated by Chung (US 4,822,025). Applicants respectfully traverse these rejections.

Claim 1 recites, "an **accumulator** pivotable about an axis, the accumulator having a print media inlet and a print media outlet" (emphasis added). Applicants submit that Chung does not teach such an accumulator. Rather, Chung teaches a guide plate 2 through which copied paper 1 passes as the copied paper 1 is discharged from the outlet of the copy machine C to a predetermined tray 17. (Chung, Col. 2, line 67- Col. 3, line 3). Hence, the Chung guide plate 2 is not an accumulator because it does not accumulate media sheets. Because Chung does not disclose an accumulator as recited in claim 1, Chung does not anticipate claim 1. Withdrawal of the rejection of claim 1 is requested.

In this regard, the Office Action states "an accumulator (guide 2; col. 3, ln 23-32 teaching staging of several sheets prior to tray delivery wherein side brackets are capable of registering sheets during the pivoting movement)" Applicants traverse this statement and submit that this section (Col. 3, lines 23-32) of the Chung reference does **not** teach staging several sheets prior to delivery to tray delivery. Rather, in this section, Chung teaches stacking copied papers upon the tray and not on the guide plate 2. Accordingly, because Chung does not teach that guide plate 2 is an "accumulator" Chung does not anticipate claim 1. Withdrawal of the rejection of claim 1 is requested for this additional reason.

Independent claims 14, 24, and 31 each recite "an accumulator" and are therefore not anticipated by Chung for at least the same reasons as claim 1 is not anticipated by Chung. Withdrawal of these rejections is requested.

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Dependent claims 2-9, 12, 13 depend upon claim 1 and are allowable for at least the same reasons as claim 1 is allowable. These claims also recite limitations not disclosed by Chung. For example, Chung does not disclose "a movable belt having a protrusion" as recited in claim 9. Dependent claims 15-19 and 21-23 depend upon claim 14 and are allowable for at least the same reasons claim 14 is allowable. These claims also recite limitations not disclosed by Chung. Further, dependent claims 32-34 depend upon claim 31 and are allowable for at least the same reasons claim 31 is allowable. These claims also recite limitations not disclosed by Chung. Applicants request withdrawal of the rejections of these dependent claims.

II. Claim Rejections – 35 USC § 103

Claims 6, 9, 10, 11, 29, 35, 39, and 40 stand rejected under 35 USC § 103. Applicants submit that these claims are allowable by virtue of their dependency upon allowable independent base claims. Withdrawal of these rejections is requested.

III. Conclusion

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 08-2025. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 08-2025. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 08-2025.

Respectfully submitted,

Date 23 May 2006
Hewlett-Packard Company
P.O. Box 272400 M/S 35
Fort Collins CO 80527-2400

By Robert D. Wasson
Robert D. Wasson
Registration No. 40,218
Telephone: 360-212-2338